

Hearing Date and Time: December 21,
2011 at 10:00 a.m.

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
DPH HOLDINGS CORP., <i>et al.</i> ,)	No. 05-44481 (RDD)
)	
Debtors.)	Jointly Administered
)	
DELPHI AUTOMOTIVE SYSTEMS, LLC,)	
)	
Plaintiff,)	Adv. Pro. No. 07-02322
-against-)	
JAMESTOWN CONTAINER CORP.,)	
)	
Defendant.)	

**JAMESTOWN CONTAINER CORP'S RESPONSE TO REORGANIZED DEBTORS'
MOTION FOR ORDER PURSUANT TO 11 U.S.C. §§ 105(d), 544, 547 AND 548 AND
FED. R. BANKR. P. 7016 ESTABLISHING (I) DATES FOR HEARINGS REGARDING
ADVERSARY PROCEEDINGS AND (II) NOTICE AND PROCEDURES GOVERNING
ADVERSARY PROCEEDINGS**

Defendant Jamestown Container Corporation, by and through counsel, hereby submits
this Response and Objection to the Reorganized Debtors' Motion For Order Pursuant To 11
U.S.C. §§ 105(D), 544, 547 and 548 and Fed. R. Bankr. P. 7016 Establishing (I) Dates For

Hearings Regarding Adversary Proceedings And (Ii) Notice And Procedures Governing Adversary Proceedings. ("Adversary Proceedings Procedure Motion").

1. In the interest of judicial economy, Jamestown Container Corporation joins and adopts all relevant arguments and authorities, as if fully stated herein, set forth in all Responses and Objections of those parties who are similar situated, including but not limited to *Adv. Pro. 07-02432 [RDD], Methode Electronics, Inc.'s Response to Reorganized Debtors' Motion for Order Pursuant to 11 U.S.C. § 105(D), 544, 547, and 548 and Fed. R. Bankr. P. 7016 Establishing (I) Dates for Hearing Regarding Adversary Proceedings and (II) Notices and Procedures Governing Adversary Proceedings*, and the filing in *Adv. Pro. 07-02259 [RDD]* by Blair Strip Steel Co. ("Blair") entitled *Brief in Opposition to Reorganized Debtors' Motion for Order pursuant to 11 U.S.C. §§ 105(d), 544, 547, and 548 and Fed. R. Bankr. P. 7016 establishing (I) dates for Hearings regarding Adversary Proceedings and (II) Notices and Procedures governing Adversary Proceedings*.

2. As delineated in the aforementioned Responses, the Reorganized Debtors' Adversary Proceedings Procedure Motion is favorable to the Reorganized Debtors, while placing unduly restrictive burdens on the Defendants. Indeed, relative to Jamestown Container Corp., many of the documents which may be relevant, even in limited discovery, either are not available or may be difficult to obtain. Notably, the proposed amended complaint relative to Jamestown has approximately 60 pages of alleged preferential transfers annexed thereto, encompassing over 1,000 transactions.

3. Moreover, the Pretrial Procedures sought by the Reorganized Debtors lack flexibility with respect to the Defendants ability to proceed, especially in light of the fact that this

Court has not yet granted the Reorganized Debtors motion to serve the Amended Complaints in the adversary proceedings which remain.

4. Jamestown Container Corp. further supports and adopts the proposed procedure as submitted in Exhibit 1 in the Response submitted in *Adv. Pro. 07-02432 [RDD], Methode Electronics, Inc.'s Response to Reorganized Debtors' Motion for Order Pursuant to 11 U.S.C. § 105(D), 544, 547, and 548 and Fed. R. Bankr. P. 7016 Establishing (I) Dates for Hearing Regarding Adversary Proceedings and (II) Notices and Procedures Governing Adversary Proceedings.*

5. Based on the objections to the Procedures Motion set forth above and incorporated herein, Jamestown Container requests that the Court deny the Procedures Motion in its entirety and instead adopt the Rule 15 Procedures advocated by Methode Electronics, Inc. in its filing.

Respectfully submitted,

Dated: Buffalo, New York
December 7, 2011

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